

# EXHIBIT E

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL CREDIT UNION  
ADMINISTRATION BOARD, as Liquidating  
Agent of Southwest Corporate Federal Credit  
Union and Members United Corporate Federal  
Credit Union,

*Plaintiff,*

v.

MORGAN STANLEY & CO., INC. and  
MORGAN STANLEY CAPITAL I INC.,

*Defendants.*

And other NCUA Actions.

Case No. 13-cv-6705 (DLC)  
Case No. 13-cv-6719 (DLC)  
Case No. 13-cv-6721 (DLC)  
Case No. 13-cv-6726 (DLC)  
Case No. 13-cv-6727 (DLC)  
Case No. 13-cv-6731 (DLC)  
Case No. 13-cv-6736 (DLC)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF KANSAS**

NATIONAL CREDIT UNION  
ADMINISTRATION BOARD, as Liquidating  
Agent of U.S. Central Federal Credit Union,

*Plaintiff,*

v.

RBS SECURITIES, INC., f/k/a/ GREENWICH  
CAPITAL MARKETS, INC., et al.,

*Defendants.*

And other NCUA Actions.

Case No. 11-cv-2340 & 2649 (JWL)  
Case No. 12-cv-2591 (JWL)  
Case No. 12-cv-2648 (JWL)  
Case No. 13-cv-2418 (JWL)

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

NATIONAL CREDIT UNION  
ADMINISTRATION BOARD, as Liquidating  
Agent of Western Corporate Federal Credit  
Union,

*Plaintiff,*

v.

RBS SECURITIES, INC., f/k/a/ GREENWICH  
CAPITAL MARKETS, INC., et al.,

*Defendants.*

And other NCUA Actions.

Case No. 11-cv-5887 (GW)

Case No. 11-cv-6521 (GW)

**DEFENDANTS' FIRST JOINT REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

19. All documents and communications on which Your computations of each category of claimed damages are based, including but not limited to documents and communications bearing on the nature and extent of damages You allege to have suffered.

20. Documents sufficient to show the analytical tools You used in deciding whether to invest in RMBS, including but not limited to any proprietary or third party vendor loss models, such as those provided by Intex, ABSNet, LoanPerformance, Bloomberg, Yield Book, PolyPaths, BlackRock, or historical or prepayment models.

21. Any loan origination files (including portions thereof), loan tapes and mortgage loan schedules for the Securitizations.

22. Documents sufficient to identify and value the securities included in any Credit Union's RMBS portfolio at all times, including the name, seller, rating, and notional amount of each of the securities, as well as the date on which any Credit Union acquired each of the securities and, to the extent that NCUA no longer holds such securities, the date of disposition and value realized upon disposition.

23. All documents and communications, including but not limited to any rules, regulations, guidelines, policy statements, standards, agreements, investigations, audits, or reports, concerning any of Your accounting policies and practices concerning the treatment of RMBS, including but not limited to such policies and practices concerning the classification of such securities as trading, available-for-sale or held-to-maturity; the determination of fair value; the recognition of other-than-temporary impairments on such securities; and the effect and application of the Financial Accounting Standards Board (FASB)'s 2009 changes to applicable accounting rules, including to Financial Accounting Standard 157.